

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JEFF HULBERT, et al.,
Plaintiffs

VS.

Civil Action No.

SGT. BRIAN T. POPE, et al., 1:18-CV-02317 GLR
Defendants

The deposition of DENNIS CLIFTON DONALDSON, JR., was held on Monday, October 21, 2019, commencing at 12:51 p.m., at the Law Offices of Hansel Law P.C., 2514 North Charles Street, Baltimore, Maryland 21218, before R. Dwayne Harrison, a Notary Public.

EXHIBIT Z

REPORTED BY: R. Dwayne Harrison

1 APPEARANCES :

2 ON BEHALF OF PLAINTIFFS

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21 (appearances CONT.)

1 (APPEARANCES CONT.)

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Deposition of DENNIS CLIFTON DONALDSON, JR.

October 21st, 2019

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[none marked]	

1 P-R-O-C-E-E-D-I-N-G-S

2 - - - - -

3 Whereupon,

4 DENNIS CLIFTON DONALDSON, JR.,

5 called as a witness, having been first duly sworn to
6 tell the truth, the whole truth, and nothing but the
7 truth, was examined and testified as follows:

8 EXAMINATION BY MR. HANSEL:

9 Q Fantastic. Lieutenant, thank you very much
10 for your time here today. My name is Cary Hansel. We
11 met off the record.

12 I'm going to go over just a couple of
13 ground rules first. I happen to know you're very well
14 advised by competent counsel. So this is probably
15 going to be old news. You may have been in this
16 setting before. I don't think we've had the pleasure,
17 but you may have in your career.

18 So, as a result, you may know a lot of what
19 I'm going to tell you, but it will keep me in practice
20 and make sure we're on the same page.

21 The principle thing to keep in mind is this

1 Q Yeah. You've heard it as of today, haven't
2 you?

3 A I'm not sure I heard it.

4 Q Ever?

5 A I don't recall.

6 Q Okay. All right. You want to hear it?
7 I've got it. Let's hear it real quick. See if it just
8 jogs your memory.

9 [An audio recording was played for the
10 witness.]

11 So in that call I'm hearing the officer at
12 the mansion, the trooper at the mansion say that
13 there's some concern about giving the lieutenant
14 governor a bunch of stuff for some reason.

15 Did you hear that?

16 A I heard it just now. Prior to this, no.

17 Q And so that gets to my next question.

18 Did Ms. Wesby make it clear to you that the
19 call had included a statement that the lieutenant
20 governor or his people didn't want him to interact in
21 some way with these protestors?

1 **it's a busy area. There's always people walking on the**
2 **sidewalks and crossing the streets and things of that**
3 **nature. A lot of traffic in that area also.**

4 Q When you consulted with Sergeant Pope the
5 next day going over the charges, is it correct to say
6 that you advised that the charges that were made in the
7 second set of citations based on what Sergeant Pope
8 told you had occurred the night before?

9 A **Yes, it was based on what he had said**
10 **before and I don't remember if anybody else had given**
11 **directions, hey, these are the ones you should use for**
12 **those incidents. I don't recall, but pretty much just**
13 **basically based on what Sergeant Pope had stated.**

14 MR. MCFARLAND: Okay. I think that's it.

15 MR. HANSEL: Nothing further. Thank you,
16 sir. I appreciate your time.

17 (Deposition was concluded at 3:53 p.m.)
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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary will be made on the Errata Sheet.

DENNIS CLIFTON DONALDSON, JR.

DATE

(If needed, make additional copies of the Errata Sheet on the next page or use a blank piece of paper.)

1 ERRATA SHEET

2 Case: Hulbert, et al. vs. Pope, et al.

3 Witness: DENNIS CLIFTON DONALDSON, JR. Date: 10-21-19

4 PAGE/LINE SHOULD READ REASON FOR CHANGE

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1 State of Maryland

2 City of Baltimore, to wit:

3 I, R. Dwayne Harrison, a Notary Public of
4 the State of Maryland, Baltimore City, do hereby
5 certify that the within-named witness personally
6 appeared before me at the time and place herein set
7 out, and after having been duly sworn by me, according
8 to law, was examined by counsel.

9 I further certify that the examination was
10 recorded stenographically by me and this transcript is
11 a true record of the proceedings.

12 I further certify that I am not of counsel
13 to any of the parties, nor in any way interested in the
14 outcome of this action.

15 As witness my hand and notarial seal this
16 4th day of November 2019.



17
18 R. Dwayne Harrison

19 Notary Public

20 My Commission Expires:

21 September 15th, 2021